

## UTAH CV1801 ELEMENTS OF FRAUD

### To state a claim of fraud, a plaintiff must allege:

- (1) Defendant made a statement about an important fact; and
- (2) That statement was false; and
- (3) It made the statement knowing it was false, or it made the statement recklessly and without regard for its truth; and
- (4) Defendant intended that its members and potential members would rely on the statement; and
- (5) Members, current & potential, reasonably relied on the statement; and
- (6) Members suffered damages as a result of relying on the statement.

### CHANGE THE ORDER:

- (1) The Corporation of the President of the LDS Church (COP) made a statement about an important fact; and
- (2) COP made the statement without a sincere belief in it, or it made it recklessly and without regard for its truth; and
- (3) the statement it made was in fact false; and
- (4) COP intended that its members and potential members would rely on the statement; and
- (5) Members, current and potential, reasonably relied on the statement; and
- (6) Members suffered damages as a result of relying on the statement.